

### REMARKS

Claims 1-6 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Dutta (U.S. Patent No. 6,480,837), and further in view of Applicant's Admitted Prior Art (AAPA). Applicant traverses the rejection as it applied to amended claims 1 and 6 because Dutta and AAPA fail to disclose or suggest an accumulation unit or step which accumulates information depending on the threshold value that is an average of a maximum value and a minimum value for a frequency of utilization.

Dutta is directed to a method, system, and program for ordering search results using a popularity weighting. A popularity weight is associated with at least one file address and keyword pair such that a file address is capable of having multiple associated keywords and one associated popularity weight for each file address and keyword pair (see the Abstract). As shown in FIG. 3a, Dutta teaches at step 114 that search results are ordered according to the sole or average popularity weight for the URLs. Dutta also discloses that popularity weighting is indicated by the frequency of selection of the URL from returned search results (Col. 1, lns. 8-10). However, Dutta does not disclose or suggest an accumulation unit or step that accumulates information in a predetermined accumulation range on an accumulation base point corresponding to location information having frequency of utilization depending on a threshold value that is an average of a maximum value and a minimum value for the frequency of utilization, as now recited in amended claims 1 and 6.

Rather, Dutta merely averages all of the popularity weights for any search result URL (Col. 5, Ins. 16-19). For this reason, withdrawal of the §103 rejection is respectfully requested.

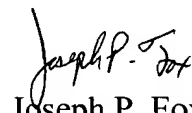
New claims 7-8 are added and further define features of the information retrieval system of claim 1. More specifically, claim 7 defines the frequency of utilization as a percentage of a number of selection times for a document location over a total number of selection times for all document locations. Claim 8 defines the predetermined accumulation range as a product of a frequency of utilization and a maximum value of the predetermined accumulation range. Applicant earnestly solicits allowance of new claims 7-8 for the features that they recite.

For all of the foregoing reasons, Applicant submits that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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